



Putting Iowa
to Work

Iowa Workforce Development

Thomas J. Vilsack, Governor

Sally J. Pederson, Lt. Governor

Richard V. Running, Director

Post-It* Fax Note	7671	Date	10/4/04	# of pages	5
To	Sean Kelly	From	Doug Keast		
Co./Dept.		Co.			
Phone #		Phone #	(515) 281-9045		
Fax #	(202) 693-3015	Fax #	(515) 281-9096		

Thanks, Sean!
Please let me know if you
have questions -
Doug Keast

Workforce Development Center Division

150 Des Moines Street • Des Moines, Iowa 50309-5563 • Phone 515-281-9328 • Fax 515-281-9096 • www.iowaworkforce.org



Thomas J. Vilsack, Governor

Sally J. Pederson, Lt. Governor

Richard V. Running, Director

Putting Iowa
to Work**Waiver Plan****Submitted October 1, 2004 by Iowa Workforce Development**

Iowa is pleased to present this request for a general waiver of statutory requirements to the Secretary of the Department of Labor. This plan is submitted according to the guidelines provided in the Final Rules published on Friday, August 11, 2000, section 661.420.

The intent of this waiver request is to temporarily remove a perceptual barrier to the improvement of the capacity of Iowa workforce systems to include youth with disabilities effectively in services and achieve quality employment and post-secondary placement outcomes with Iowa youth. Iowa Workforce Development has entered into partnership agreements with other Iowa state agencies to compete successfully in receiving grants from the Social Security Administration (SSA) and the Department of Labor's (DOL) Office of Disability Employment Policy (ODEP) to demonstrate innovative transition practices for youth with disabilities. Strategies that will be highlighted will include strengthened development of a community's natural supports through resource mapping, braided service funding strategies, focused development of accommodated work experience opportunities, and the development of stronger partnership relationships with new agencies experienced through co-enrollment of students.

Specifically, through discussion with multiple State agency and organizational partners, we seek to enroll participants with both initiatives in the WIA Youth Service Programs in 5 Iowa regions. The students that will be included as participants in both programs are individuals that would not be enrolled in the WIA Youth Services in our state at present time, because they would not be perceived by staff as able to achieve the current standards for performance outcomes, given the resources and tools traditionally available to these local programs. The purpose of the two grants is to demonstrate experience using new tools, partnerships, problem solving strategies to achieve quality outcomes in programs that would not have, on their own, previously risked their performance accountability by enrolling them. The students that these projects seek to include are those currently in special education programs who do not experience the same opportunities to develop natural networks in their communities that will support them in career choices that other young Iowans have. They have multiple physical, mental and emotional challenges, which, when presented to workforce staff, do not appear to possess the ability to achieve successful outcomes with the traditional tools available through our current workforce system. These are young people who might be referred to sheltered employment or other segregated institutions without this intervention. It

is important to expand our ability to include those with additional challenges and stigma that we would not have before. We request a waiver of performance measures for grant participants in 5 Iowa regions, to support those programs to expand their ability and resources to include young people who might find our services inaccessible due to stigma and lack of experience in problem solving to achieve quality outcomes in employment. This request is articulated in the following plan.

Multiple intermediary agencies will be engaged in providing services in addition to those provided by the WIA programs, and other One-Stop partner agencies, so the participants will be enrolled in multiple services and programs, and share the case management and planning roles.

- I. This waiver plan is submitted subsequent to the WIA 5-year Strategic Plan, which has already been approved.
- II. This Plan is specific only to WIA activities in Regions 2, 4, 11, 13 and 16 in Iowa.

1) Statutory Waiver Request We request a waiver for the above cited Iowa regions to the requirements of the Workforce Investment Act, Title I, Subtitle B, Section 136, where Youth Program performance measures are described, for the participants of the two Youth Transition Demonstration grants funded in Iowa by the SSA and ODEP. The Waiver would apply only in Regions 2, 4, 11, 13 and 16 over a three year period beginning October 1, 2004, and ending September 30, 2007. The number of youth targeted for participation in these five regions:

Region 2:	up to 300 (SSA Grant)
Region 4:	28 (ODEP Grant)
Region 11:	up to 300 (SSA Grant)
Region 13:	50 (ODEP Grant)
Region 16:	50 (ODEP Grant)

This request supports activities in Iowa to address the first two goals of our Unified State Plan:

Goal 1:	Increase the size of the Iowa Workforce
Goal 2:	Increase the earned income of Iowa workers

This request also addresses the following challenges noted in the needs assessment included in Iowa's Unified State Plan:

- Decrease in the number of available workers
- Need to better prepare students in the workplace

- Include untapped human resources *"Iowa must utilize the talents of all of its citizens to maintain and grow the economy."*
- Address the wage gap *"the income of less skilled workers is falling."*

This request also supports the following objectives for the Title I WIA services noted in the Unified State Plan:

- Increase the size of the skilled work force
- Increase lowans earned income
- Grow targeted industries and needed workforce skills

2) Actions to remove regulatory barriers Conversation has been initiated by Iowa Workforce Development with representatives of the Employment and Training Administration in regard to the possibility of waiving the requirement for inclusion of these individuals in performance measures. It was suggested at that time that the state pursue a renegotiation of performance measures as a means to support the state in including these participants in WIA services. We do not believe that it is possible to renegotiate performance measures effectively for purpose of these initiatives for the following reasons:

- a) data does not exist to support effective negotiation of measures using braided funding sources and multiple partners. These relationships (between service agencies) locally will be unique to the extent in serving the target group for these grants, that you would not be able to generalize the outcome information. It is not likely that individuals in this target group have been served either by WIA Youth or JTPA Youth services in the past.
- b) agreeing upon new performance measures may not change the enrollment behavior for providers not wishing to put their programs "at risk" by enrolling individuals which they do not have confidence in realizing the positive outcomes necessary for the program. The target population is easy to dismiss as "unlikely to benefit" from program services if enrolled.

3) Goals of Waiver and Programmatic outcomes

- a) Local WIA programs will become part of local teams designed to "problem solve" and demonstrate effective transition for students with disabilities who might not previously have been served by the Iowa Workforce Center system.

- b) All participants will be registered and served by multiple local community services.
- c) All participants will include among their personal network persons not paid to work with them or live with them.
- d) All participants will demonstrate positive outcomes in career growth, or post-secondary education enrollment.

4) Individuals effected by the waiver

The 728 youth participating in the SSA and DOL Transition Demonstrations in Iowa. These are students with disabilities who may be served in school districts in special education programs, and whom educators, families and others may not understand how they can work in the community using the traditional transition and labor exchange services.

5) Processes used to:

i. Monitor progress

The SSA grant region activities are evaluated by the University of Iowa's Employment Policy Group, and the ODEP grant region activities are evaluated by Dr. Robert Stensrud working with Drake University's Rehabilitation Institute.

A Program Coordinator, with Iowa Workforce Development's Targeted Services Bureau will monitor progress with Regional Workforce Investment Boards, WIA service providers, and the above grant evaluators to monitor progress and outcomes.

ii. Provide notice to local boards impacted

This request and plan has been sent to the RWIB Chairs, and One-Stop Operator in the 5 regions identified.

iii. Local board comment on request

With Board and Operator contact, a request for comment has been extended for a period of 30 days. The service providers have been involved in the application and planning of these demonstration projects.

iv. Ensure meaningful public comment, including local business and organized labor

Each Regional Workforce Investment Board includes 5 business representatives and 5 labor representatives.